

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER
DISTRICT JUDGE

*Richard Ramirez v. Mylan Laboratories
Ltd., et al.
(Case No. 1:20-cv-05595-RBK-JS)*

**PLAINTIFFS' CROSS NOTICE OF VIDEOTAPED DEPOSITION OF
GERARDO J. FRANCO, D.O., P.A.**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Plaintiff will take the cross deposition upon oral examination of Gerardo D. Franco, D.O., P.A., on **November 10, 2021 at 5:00 p.m. EST**, and continuing until completion, via Zoom video conference. Additional counsel who wish to attend remotely will have the option to do so using audio visual conference technology and should contact Veritext at valsartan@veritext.com to arrange for login credentials to be sent to them prior to the deposition. The deposition will be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached hereto.

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

David McClendon
Watts Guerra, LLC
5726 West Hausman Rd. Ste. 119
San Antonio, TX 78249

Telephone: (210) 448-0500
E-Mail: dmcclendon@wattsguerra.com

Date: October 27, 2021

Respectfully submitted,

/s/ Paige N. Boldt
Paige N. Boldt
WATTS GUERRA LLC
5726 West Hausman Rd. Ste. 119
San Antonio, TX 78249
Telephone: (210) 448-0500
E-Mail: pboldt@wattsguerra.com

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of October 2021, I caused a true and correct copy of the foregoing Cross Notice of Videotaped Deposition of Gerardo Franco, D.O., P.A. to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on October 27, 2021.

This 27th day of October 2021.

/s/ Paige N. Boldt
Attorney for Plaintiff

Exhibit A

Documents to be Produced

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.